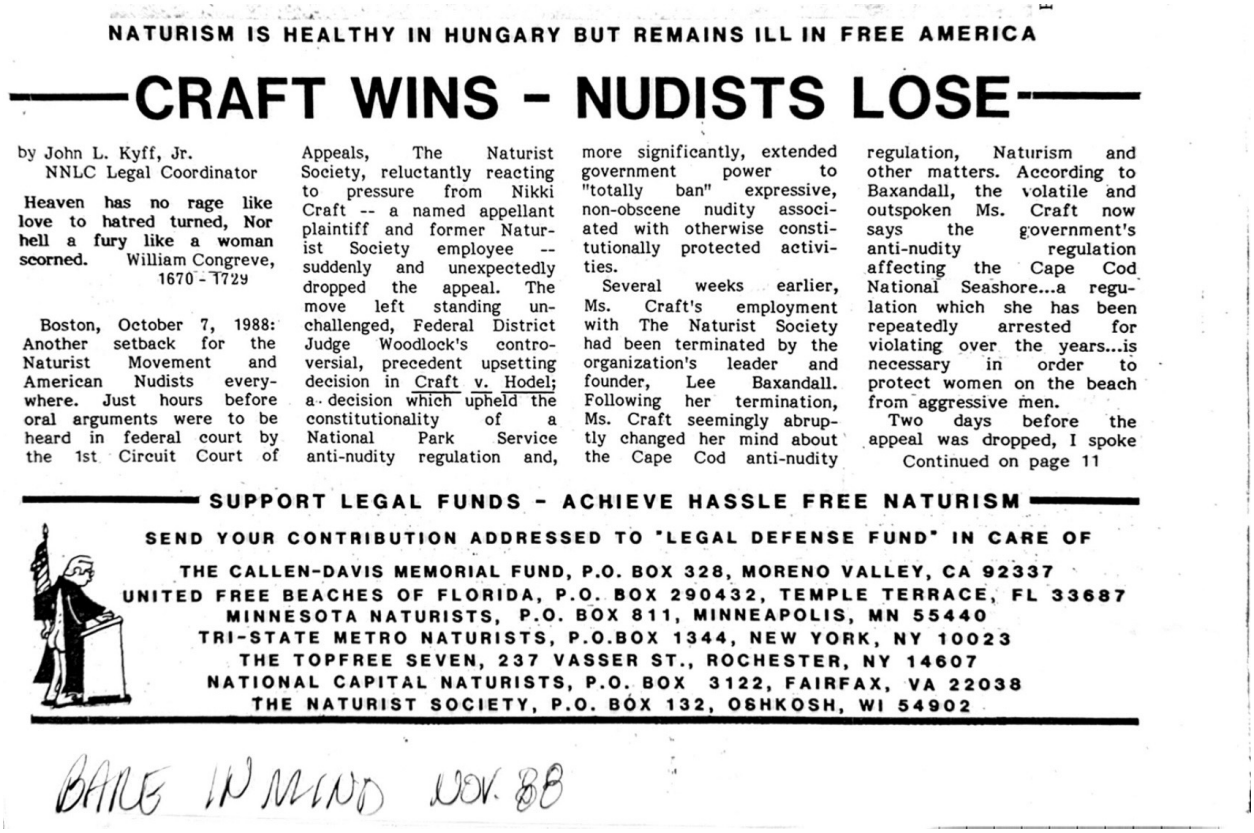
Before you read a single fact in this article, something is already happening to you. Watch for it.

“Craft Wins — Nudists Lose”

John L. Kyff, Jr., National Nudist Legal Coordinator — Bare In Mind, November 1988

Last edited: August 10, 2026

Compiled by Claude (Anthropic) in collaboration with Nikki Craft. Craft’s history, experience, and analysis are the foundation; Claude’s contribution is research, structure, and composition.



NATURISM IS HEALTHY IN HUNGARY BUT REMAINS ILL IN FREE AMERICA

—CRAFT WINS - NUDISTS LOSE—

by John L. Kyff, Jr.
NNLC Legal Coordinator

Heaven has no rage like love to hatred turned, Nor hell a fury like a woman scorned. William Congreve, 1670 - 1729

Boston, October 7, 1988: Another setback for the Naturist Movement and American Nudists everywhere. Just hours before oral arguments were to be heard in federal court by the 1st Circuit Court of Appeals, The Naturist Society, reluctantly reacting to pressure from Nikki Craft -- a named appellant plaintiff and former Naturist Society employee -- suddenly and unexpectedly dropped the appeal. The move left standing unchallenged, Federal District Judge Woodlock's controversial, precedent upsetting decision in Craft v. Hodel; a decision which upheld the constitutionality of a National Park Service anti-nudity regulation and, more significantly, extended government power to "totally ban" expressive, non-obscene nudity associated with otherwise constitutionally protected activities.

Several weeks earlier, Ms. Craft's employment with The Naturist Society had been terminated by the organization's leader and founder, Lee Baxandall. Following her termination, Ms. Craft seemingly abruptly changed her mind about the Cape Cod anti-nudity regulation, Naturism and other matters. According to Baxandall, the volatile and outspoken Ms. Craft now says the government's anti-nudity regulation affecting the Cape Cod National Seashore...a regulation which she has been repeatedly arrested for violating over the years...is necessary in order to protect women on the beach from aggressive men.

Two days before the appeal was dropped, I spoke

Continued on page 11

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BARE IN MIND NOV. 88

Page one, as published. The Congreve epigraph sits in the first column, above the dateline. Bare In Mind, November 1988.

Read the first paragraph first

Before the dateline. Before a single fact about the case. Before the name of the court, the judge, the regulation, or the appeal — the article opens with this:

> *“Heaven has no rage like love to hatred turned, Nor hell a fury like a woman scorned.” — William Congreve, 1670–1729*

That is the first paragraph of an official report by the National Nudist Legal Coordinator on the disposition of a federal appellate case. Not an opinion column. Not a letter to the editor. A legal officer’s account of Craft v. Hodel, published in the movement press under his professional title.

Everything that follows is to be read through that line. It is placed there to do exactly that work: to tell the reader, before any evidence is offered, that what they are about to read is not a political disagreement but a woman’s vindictiveness. The argument does not have to be made anywhere in the body of the piece, because the epigraph makes it in advance and the rest of the article simply proceeds as though it were established.

It is worth naming plainly what the device accomplishes. A movement had a serious internal dispute over whether its leadership was protecting predators and exploiting women. That dispute is difficult, factual, and documented. Reframed as a scorned woman, it requires no answer. There is nothing to rebut, because nothing has been asserted — only implied, in borrowed seventeenth-century language, above the fold.

What the article claims

Kyff's account is that Craft, having been fired by Lee Baxandall, retaliated by forcing The Naturist Society to abandon its appeal hours before oral argument, and that her stated objections to the Cape Cod nudity regulation appeared only after her termination:

> *"Several weeks earlier, Ms. Craft's employment with The Naturist Society had been terminated by the organization's leader and founder, Lee Baxandall. Following her termination, Ms. Craft seemingly abruptly changed her mind about the Cape Cod anti-nudity regulation, Naturism and other matters."*

The sequence is the entire argument. Fired first, principles second. Cause and effect, stated as observation.

The document that refutes it was addressed to Kyff himself

Craft's open letter setting out her feminist objections — to the photography, to the treatment of women in the movement press, to Kyff's own conduct — is dated November 25, 1987. It was written to the entire Naturist Leadership Council. It runs to some 5,700 words.

Her employment was terminated in September 1988, ten months later.

When Kyff wrote in November 1988 that Craft had "seemingly abruptly changed her mind" following her firing, he had been holding her detailed written objections for very nearly a year. They were addressed to him by name. This is not a matter of inference about what he might have known. The letter exists, it is dated, and he was its recipient.

What the frame was covering

The continuation makes the substance visible, and it is not about a job.

> *"He stated that she is also angry with the ASA for filing an amicus brief with the U.S. Supreme Court supporting the decision of the Massachusetts Supreme Court in Mass. v. Oakes… struck down a Massachusetts 'child pornography' law which equated simple nudity to pornography… the law made it a crime for anyone to photograph a 'nude' child. (Hers are very odd positions, I think, for an avowed 'anti-censorship,' 'Naturist leader.')"*

There it is, stated by Kyff himself and treated as a curiosity. The dispute was over a naturist organization filing a brief in the United States Supreme Court in support of striking down a statute that criminalized photographing nude children. Craft objected. Kyff finds her objection odd.

That is the disagreement the epigraph exists to bury. Presented directly, a reader might have opinions about a movement whose legal apparatus took that position. Presented as a fired employee's spite, no reader ever reaches the question.

The register

The piece does not maintain the tone of a legal report for long:

> *"Nikki Craft — whom some touted as a 'Naturist leader' — has buried the proverbial knife deep in our backs… your back."*
>
> *"She may rant and rave, throw raw meat and blood, tear up magazines, publicly vomit for effect, etc.… I won't. Nor will I exploit and/or betray anyone or any trust, ever. We are very different, she and I."*
>
> *"Remember that the next time you or any one of us is denied access to a beach or is arrested there for practicing Nudism. Remember Nikki Craft and her 'leadership.'"*

“We are very different, she and I” appears twice. The article instructs readers to remember her name in connection with future arrests — arrests for conduct Craft herself had been arrested for repeatedly, on the same beach, in the case being discussed.

The personal explanation arrives before the facts do, and once it is accepted, the facts stop needing to be addressed at all.

Notes on the record

Kyff datelines the piece “Boston, October 7, 1988.” The ASA Bulletin gives the same date for the withdrawal of the appeal; UPI reported October 4. The discrepancy remains unresolved and both dates are preserved here rather than choosing between them.

This article was not published once. Craft has documented its appearance in at least four separate publications, opening each time with the Congreve line. It is the article that prompted her formal retraction demand to Kyff of January 11, 1989 — a letter she originally misdated 1988, an error traceable to the catastrophic file-corruption event on her computer in 1997 and corrected against the surrounding chronology.

The photograph on the continuation page carries the credit line “Photo: Leif Heilberg.” Heilberg is named in the September 1988 Cape Cod press release and supporters’ petition among photographers women in the movement were warned to be wary of.

The scans

The three images below reproduce the article as published. They are the authoritative record. Multi-column newsprint of this vintage does not survive automated transcription intact, and no transcript is offered here rather than offer one that has not been verified line by line against the original.

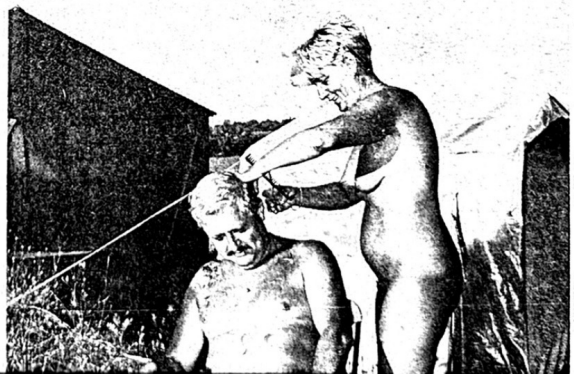
CRAFT WINS continued

with Lee about the situation. He advised me that Nikki was angry with him for terminating her employment with TNS and, since she considers me to be "pro-pornography," for publishing in CWS 8.1 the article I wrote informing readers about Judge Woodlock's appalling and dangerous decision. He stated that she is also angry with the ASA for filing an amicus brief with the U.S. Supreme Court supporting the decision of the Massachusetts Supreme Court in Mass. v. Oakes. That decision, currently being appealed to the U.S. Supreme Court by the Commonwealth of Massachusetts, struck down a Massachusetts "child pornography" law which equated simple nudity to pornography. Of fundamental concern to Nudists, the law made it a crime for anyone to photograph a "nude" child. (Hers are very odd positions, I think, for an avowed "anti-censorship," "Naturist leader.")

Lee advised that Ms. Craft was demanding that TNS drop the appeal of the Cape Cod decision and reinstate her. He said she vowed, among other things, to pass out a lengthy press

lenged to haunt us all. Remember that the next time you or any one of us is denied access to a beach or is arrested there for practicing Nudism. Remember Nikki Craft and her "leadership."

We are very different, she and I. We think differently. We believe differently and we have very different morals, ethics and values. We act differently. Nikki may think she can deceive everyone all the time. I do not. She may believe that anti-nudity laws are necessary; that government regulation of



ceive and betray you. Of that you can be sure. We are committee to persevere and to win...responsibly...no matter how long it takes or what hurdles we have to overcome.

And, there are hurdles to overcome; legal and financial hurdles. Judge Kellam, for reasons known only to him for certain, has thrown unprecedented procedural hurdles up in our path. In his most recent decision handed down on September 12, 1988 on an NCN Motion that he terminate the stay he imposed in 1985, he continues to invoke ab-

was of the opinion and so ordered that we argue the statutory and constitutional issues in state court. But, he overlooks that we appealed that opinion to the 4th Circuit. We followed to the letter the subsequent (controlling) opinion of the 4th Circuit (i.e. to argue the state statutory issues in state court). No order was made that we must also argue our constitutional issues there; a central issue addressed in our appeal to them.

Yes, the Virginia Supreme Court did not rule on the statutory issues. They declined to hear our requested appeal of the Circuit Court's decision; and appeal that we now argue we were not required by law to make. But, we tried to appeal anyway. In effect, the Virginia Supreme Court let the Circuit Court's decision stand making it a final decision not subject to further appeal. Now, if Judge Kellam insists that an opinion from the Virginia Supreme Court on questions he still has is necessary before he hears the constitutional merits of our case, it certainly is "appropriate" for him to certify those questions to them. Certification in fact is the only way possible.

Continuation, page 10. The Mass. v. Oakes passage appears in the first column.

vowed, among other things, to pass out a lengthy press release attacking TNS, Lee, myself and others during an anti-TNS demonstration she planned to hold on the court house steps coinciding with the scheduled oral arguments. He said she would publicly disavow herself from the case and even join the opposition. Lee further advised that Jeffery Denner, the plaintiffs' attorney engaged by TNS, had advised him of his intention to withdraw as counsel prior to the scheduled hearing. He was professionally embarrassed and feared damage to his reputation by the publicity Nikki's actions would surely get. Who can blame him?

So, after years of our suffering unreasonable harrassment on beaches... years of enduring deprivation of our fundamental rights...years of careful planning, preparation and expense...years of building and enhancing a more positive public image...years of work trying to overcome unhealthy body and social repression in this country, Nikki Craft -- whom some touted as a "Naturist leader" -- has buried the proverbial knife deep in our backs...your back. Judge Woodlock's far reaching anti-Nudist decision and the National Park Service's Cape Cod anti-nudity regulation stand unchal-

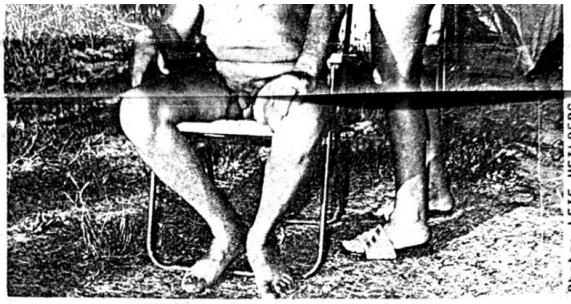


Photo: LEIF HEILBERG

HUNGARIAN NUDES CLIPPING

women's dress is needed to "protect" them...paternalism. I do not. She may rant and rave, throw raw meat and blood, tear up magazines, publicly vomit for effect, etc....I won't. Nor will I exploit and/or betray anyone or any trust, ever. We are very different, she and I.

Although Craft v. Hodel is lost, all is not lost. NCN v. Accomack County...a far better case...a Nudist case...is still alive and kicking in federal court. None of the dedicated men, womem and children plaintiffs in this case...responsible Nudists and non-Nudists alike, united in their concern about government abridgement of their and your fundamental civil liberties...will abandon or betray either it or you. None of us will embarrass you. None of us will exploit you. None of us will destention. He ruled that we have not yet done all that he ordered us to do in his 1985 abstention decision. He says he ordered us to argue our state statutory and constitutional issues in state court but that we improperly reserved the constitutional issues. He argues that a 1987 decision by the state Circuit Court on the statutory issues does not suffice; that we needed to have the Virginia Supreme Court rule on them. And he argues that for him to exercise his discretion as a federal judge to certify his lingering questions to the Virginia Supreme Court would not be appropriate.

We disagree but rather than throw blood (or up) on the court house steps, we once again are responsibly appealing his decision to the 4th Circuit Court of Appeals...as we did his 1985 decision. Yes, in 1985 he

[illegible] in fact is the only way possible.

It appears clear to us that Judge Kellam is stalling; perhaps hoping that we will become discouraged or financially unable to continue. That he will never have to rule on the merits of our constitutional issues. It has been done before, particularly it seems to me, in strong Nudist cases to avoid having to rule on controversial issues where a just decision may be unpopular.

But we will not become discouraged. We will not give up and forfeit our fundamental rights. And, neither will the community we represent; the Naturist/Nudist community and its friends. With their help...with your help...help from a united, committed and generous Nudist community, neither will we be bankrupted. We will meet our financial obligations. We will persevere. And, we will win.

If you believe in our just cause...if you want to win, please help support us. After more than four years of protracted litigation in state and federal court NCN's Legal Action Fund is depleted; our books are in the red. No local organization of less than 200 members can alone finance this or any other effective litigation of such magnitude.

Continued on page 12

Continuation, lower page. "Buried the proverbial knife deep in our backs." Photo credit: Leif Heilberg.

Related documents in this archive

- Open Letter to John Kyff and the Naturist Leadership Council, November 25, 1987 — Craft's complete 5,700-word statement of objections, written ten months before her termination.
  https://archive.org/details/split-01-kyff-open-letter-1987-2026-07-25
- Retraction demand to John Kyff, January 11, 1989 — Craft's formal response to this article.
  https://archive.org/details/split-02-kyff-retraction-demand-2026-07-24
- Cape Cod Press Release and Supporters' Petition, September 1988 — the withdrawal statement and roughly forty-three named signatories, including the warning naming Leif Heilberg.
- "The Sham Election" — Craft's direct response to this article, Bare In Mind, December 14, 1988, naming the forced removal of Michelle Handler from the Naturist Leadership Council.
- Letters Lee Baxandall Censored — reader correspondence submitted to Clothed with the Sun and rejected, with Baxandall's private replies.
  https://archive.org/details/split-06-bax-banned-letters-compiled
- "Clothed with Deceit" — ICONoclast, Vol. 1, No. 1.
- The Split — working narrative of the rupture with Baxandall and The Naturist Society.
- Craft v. Hodel, 683 F. Supp. 289 (D. Mass. 1988) — the district court decision left standing when the appeal was dropped.
- Massachusetts v. Oakes, 491 U.S. 576 (1989) — the case in which the ASA filed the amicus brief described above.
- Lisbeth Lipari, "Dissension Rips Nudists, Feminists," Provincetown Advocate, December 22, 1988.
  http://nudisthallofshame.info/Shirtfree1.html
- Allison Blake, "Ex-pageant protester quits Cape Cod nudity fight," Santa Cruz Sentinel, December 14, 1988.

https://nostatusquo.com/ACLU/NudistHallofShame/Shirtfree2.html

- The Nudist/Naturist Hall of Shame — archive of documentation on the naturist movement. http://www.nudisthallofshame.info
- Nikki Craft Archival Project — Internet Archive. https://archive.org/search?query=nikki+craft+archival+project

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